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Proposed Counsel for Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X
In re:	:
	: Chapter 11
	:
GOL LINHAS AÉREAS INTELIGENTES S.A., <i>et al.</i> , ¹	: Case No. 24-10118 (MG)
	:
	:
Debtors.	: (Jointly Administered)
	:
	X

**FOURTH SUPPLEMENTAL DECLARATION OF
JESSE DELCONTE OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, Jesse DelConte, state under penalty of perjury, that:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GOL Linhas Aéreas Inteligentes S.A. (N/A); GOL Linhas Aéreas S.A. (0124); GTX S.A. (N/A); GAC, Inc. (N/A); Gol Finance (Luxembourg) (N/A); Gol Finance (Cayman) (N/A); Smiles Fidelidade S.A. (N/A); Smiles Viagens e Turismo S.A. (N/A); Smiles Fidelidade Argentina S.A. (N/A); Smiles Viajes y Turismo S.A. (N/A); Capitânia Air Fundo de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); Sorriso Fundo de Investimento em Cotas de Fundos de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); and Gol Equity Finance (N/A). The Debtors' service address is Praça Comandante Linneu Gomes, S/N, Portaria 3, Jardim Aeroporto, 04626-020 São Paulo, São Paulo, Federative Republic of Brazil.

1. I am a Partner and Managing Director of AlixPartners, LLP (“AlixPartners”),² which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

3. I submit this supplemental declaration in the cases of the above-captioned debtors (collectively, the “Debtors”) to supplement the disclosures set forth in my original declaration dated February 20, 2024 [Docket No. 161] (the “Original Declaration”), my first supplemental declaration dated March 7, 2024 [Docket No. 235], my second supplemental declaration dated June 11, 2024 [Docket No. 707], and my third supplemental declaration dated October 7, 2024 [Docket No. 995].

4. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- As set forth in the Original Declaration, AP follows a practice to solicit from its Institutional Investors their connections to the Investor Search Parties. In response, the Institutional Investors have offered the following disclosures of their respective connections to the Investor Search Parties:
 - CDPQ – equity investment in Julius Baer Group Ltd., Manulife Financial Corp. and Legal & General Group PLC, in each case representing less than one percent (1%) of total assets under management; no investment in any other Investor Search Parties.
- AP follows a practice to solicit from the members of its Boards their connections to the parties in interest independent of AP. In response, one or more of the members of its Boards have offered the following disclosures:
 - Grosvenor Capital Management, L.P. is an additional notice of appearance party to the Debtors. An AP investor or one of its affiliates had an investment in Grosvenor Opportunistic Credit Fund III (TI) LP.

² Capitalized terms used herein shall have meanings ascribed to them in the Original Declaration.

- Aergo Capital, an aircraft and equipment lessor to the Debtors, is a lessor to a current AP client in matters unrelated to the Debtors.
- AGF Management Ltd., noteholders to the Debtors, and affiliated entities, are shareholders and lenders to current and former AP clients in matters unrelated to the Debtors.
- AIG and AIG Seguros Brasil S.A., insurance providers and vendors to the Debtors, and affiliated entities, are investors to a current AP client in matters unrelated to the Debtors.
- American Airlines, a related entity and significant equity holder to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- Avenue Aviation Opportunities Fund III (Onshore), L.P. (Avenue Capital), and Avenue Capital Management II, L.P., noteholders to the Debtors, and affiliated entities, are current AP clients in matters unrelated to the Debtors.
- AXS Bolivia S.A., a utility provider to the Debtors, and affiliated entities, are affiliates to a former AP client in matters unrelated to the Debtors.
- Banco Citi, Banco Citibank S.A. (Brasil), Banco de Chile (Citibank), Citi, Citibank, Citibank NA, Citibank Brasil, Citibank Argentina, Citibank Ecuador, Citibank del Peru S.A., Citibank N.A. Republica Dominicana, Citibank Uruguay, Grupo Financiero Banamex, and Citigroup Inc., depository banks and contract counterparties to the Debtors, and affiliated entities, are investors to a former AP client in matters unrelated to the Debtors.
- Banco de la Nación, a depository bank to the Debtors, and affiliated entities, are former employers of a current AP employee.
- Banco Santander, Banco Santander (Brasil) S.A., Banco Santander Brasil, Banco Santander Rio S.A., Banco Santander Uruguay, Banco Santander-Chile, Santander, Santander Madrid, Santander Mexico, Santander NY and Santander Singapore, other secured debtholders, depository banks, unsecured creditors and letters of credit providers to the Debtors, and affiliated entities (“Santander”), are parent companies to a current AP client in matters unrelated to the Debtors. Santander is a former employer of current AP employees.
- Boeing Commercial Airplane and Boeing Distribution, Inc., unsecured creditors to the Debtors, and affiliated entities, are limited partners to a former AP client in matters unrelated to the Debtors.
- BTG Pactual, BTG Pactual Holding SA and Banco BTG Pactual S.A., depository banks and other secured debtholders to the Debtors, and affiliated entities, are affiliates to a current AP client in matters unrelated to the Debtors.

- BTG Pactual, BTG Pactual Holding SA and Banco BTG Pactual S.A., depository banks and other secured debtholders to the Debtors, are affiliates to a current AP client in matters unrelated to the Debtors.
- CAE South America Flight Training, an unsecured creditor to the Debtors, and affiliated entities, are current and former AP clients in matters unrelated to the Debtors.
- Elliott Associates, L.P. and Elliott International, L.P., related entities and significant equity holders to the Debtors, and affiliated entities, are litigation parties and investors to current and former AP clients in matters unrelated to the Debtors.
- Engie Brasil Servicos Aeroportuario, an unsecured creditor to the Debtors, and affiliated entities (“Engie”), are current AP clients in matters unrelated to the Debtors. Engie is a vendor to AP.
- Estado de Pernambuco, a litigation party to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Florida Dept of Revenue, a taxing authority to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.
- Fortress Investment Group LLC, a noteholder to the Debtors, is an investor to a current AP client in matters unrelated to the Debtors.
- GE Celma LTDA. and GECAS (GE Capital Aviation Services), unsecured creditors and additional notice of appearance party to the Debtors, and affiliated entities, are related parties and associated companies to current and former AP clients in matters unrelated to the Debtors.
- GLAS Trust Company LLC, an additional notice of appearance party to the Debtors, and affiliated entities, (“GLAS”), are adverse litigation parties and lienholders to current AP clients in matters unrelated to the Debtors. GLAS was a member of the official committee of unsecured creditors that retained AP in Chesapeake Energy Corporation, a former bankruptcy matter unrelated to the Debtors
- GLG Partners Limited, a noteholder to the Debtors, and affiliated entities, are adverse litigation parties to a current AP client in matters unrelated to the Debtors.
- Goodyear Do Brasil Produtos De Borr, an unsecured creditor to the Debtors, and affiliated entities, are lienholders to a current AP client in matters unrelated to the Debtors.
- Intelsat Inflight Brasil Telecommunication, an unsecured creditor to the Debtors, and affiliated entities (“Intelsat”), are lessors and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Intelsat is a former AP client in matters unrelated to the Debtors.

- International Air Transport Association is an unsecured creditor to the Debtors. A senior advisor to AP is a Senior Advisor with the International Air Transport Association (IATA).
- Kroll Restructuring Administration LLC, a professional to the Debtors, and affiliated entities, are valuation services providers and accounting/tax advisors to AP.
- Lockton Inc., an insurance provider to the Debtors, and affiliated entities, are former AP clients in matters unrelated to the Debtors.
- Lufthansa Technik AG, a creditor to the Debtors, and affiliated entities (“Lufthansa”), are affiliates and parent companies to former AP clients in matters unrelated to the Debtors. Lufthansa is a former employer of current AP employees.
- Macquarie Bank Limited and Macquarie AirFinance (Macquarie), contract counterparties and aircraft and equipment lessors to the Debtors, are professionals to a former AP client in matters unrelated to the Debtors.
- Milbank LLP, a professional to the Debtors, is opposing counsel to current AP clients in matters unrelated to the Debtors. Milbank LLP is a former employer of a current AP employee.
- MTU Maintenance Hannover GMBH, an unsecured creditor to the Debtors, and affiliated entities, are former employers of a current AP employee.
- NautaDutilh Avocats Luxembourg S.à.r.l., a professional to the Debtors, and affiliated entities, are professionals and counsel to current AP clients in matters unrelated to the Debtors.
- Orix Aviation, an aircraft lessor to the Debtors, and affiliated entities (“Orix”), are lenders, parent companies, associated companies and related parties to current and former AP clients in matters unrelated to the Debtors. Orix is a current and former AP client in matters unrelated to the Debtors.
- Petrobras Distribuidora S/A and Petrobras PY Distribucion Limited, fuel suppliers to the Debtors, and affiliated entities, are joint-venture entities, bondholders, affiliated companies and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.
- SAP Brasil LTDA, a vendor to the Debtors, and affiliated entities, are former employers of current AP employees.
- Satair USA Inc., a vendor to the Debtors, and affiliated entities, are former AP clients in matters unrelated to the Debtors.
- Securities and Exchange Commission, an unsecured creditor to the Debtors, is a litigation party to current AP clients in matters unrelated to the Debtors.

- SMBC Aviation Capital and Sumitomo TKO, aircraft and equipment lessors and letter of credit providers to the Debtors, and affiliated entities, are related parties and lessors to current and former AP clients in matters unrelated to the Debtors.
- St James's Place PLC, an other secured debtholder to the Debtors, is a bondholder to a current AP client in matters unrelated to the Debtors.
- STS Engineering Solutions LLC, a vendor to the Debtors, and affiliated entities, are related parties to a current AP client in matters unrelated to the Debtors.
- Susquehanna Advisors Group, Inc., a noteholder to the Debtors, and affiliated entities (“Susquehanna”), are bondholders, lenders, parent companies and shareholders to current and former AP clients in matters unrelated to the Debtors. Susquehanna is a current AP client in matters unrelated to the Debtors.
- Swissport Brasil LTDA, an unsecured creditor to the Debtors, and affiliated entities (“Swissport”), are shareholders to a former AP client in matters unrelated to the Debtors. Swissport is a former AP client in matters unrelated to the Debtors.
- TAM Linhas Areas S.A., a party in interest to the Debtors, is an affiliate to a former AP client in matters unrelated to the Debtors.
- Tokio Marine and Tokio Marine Seguradora S.A., insurance providers and unsecured creditors to the Debtors, and affiliated entities (“Tokio Marine”), are investors to a current AP client in matters unrelated to the Debtors. Tokio Marine is a current AP client in matters unrelated to the Debtors.
- Travelex Bank, a depository bank to the Debtors, and affiliated entities, are current AP clients in matters unrelated to the Debtors.
- Two Seas Global (Master) Fund LP, a party in interest to the Debtors, and affiliated entities, are bondholders and lenders to current and former AP clients in matters unrelated to the Debtors.
- U.S. Specialty Insurance Co., an additional notice of appearance party to the Debtors, is a bondholder to a current AP client in matters unrelated to the Debtors.
- Värde Partners, Inc., a noteholder to the Debtors, is a joint venture entity to a current AP client in matters unrelated to the Debtors.
- Wilmington Trust Company, as owner trustee, Wilmington Trust SP Services (Dublin) Limited, as owner trustee and Wilmington Trust, National Association, aircraft and equipment lessors and additional notice of appearance parties to the Debtors, and affiliated entities, were members of the official committee of unsecured creditors that retained AP in Enviva Inc., a former bankruptcy matter unrelated to the Debtors.

5. AlixPartners does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement AlixPartners' disclosures in the event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: June 11, 2025
New York, NY

AlixPartners, LLP

/s/ Jesse DelConte
Jesse DelConte
Partner & Managing Director